

From: [Katherine Marchant](#)
To: [Bruce, Gavin \(USAOR\)](#)
Cc: [Janet Hoffman](#); [Ethan Hazel](#)
Subject: Hankins - discovery requests
Date: Friday, January 20, 2023 1:52:00 PM

Gavin,

As requested, below please find our list of materials that we need in order to reasonably respond to the facts alleged in Endeavor's victim impact statement. Please let us know as soon as possible when we can expect to receive these documents, so that we can seek authorization for a subpoena to the extent necessary. As an aside, and for convenience sake, all references to "Endeavor" below include the William Morris Endeavor Entertainment, LLC-related entities as described in the Superseding Information and noted in the victim impact statement.

Best,
Katie

Requested documents:

1. Exiger's final report, as well as drafts and materials that Endeavor provided to Exiger for its review in connection with its investigation and/or report.
2. All communications within Endeavor regarding Exiger's investigation and/or report, as well as communications between Endeavor and Exiger regarding Exiger's investigation and/or report.
3. Materials that support Endeavor's claim that WCMC, LLC ("WCMC") is also a victim. This includes, but is not limited to, materials Endeavor relied on in support of its allegations that Ms. Hankins stole or otherwise misappropriated funds from WCMC.
4. Promissory note that Ms. Hankins signed in July of 2016, which is referenced on page 3 of the victim impact statement, as well as materials evidencing advancement(s) pursuant to the note.
5. Emails or other materials created and/or dated between March 1, 2018, and September 30, 2018, that relate to Endeavor's claims that Ms. Hankins "began to raise suspicions" by "requesting additional infusions of funds to pay vendors, discrepancies in her financial reporting, and her wish to begin selling tickets for the 2019 festival earlier than expected." This claim is further described on page four of the victim impact statement.
6. Emails or other materials created and/or dated between March 1, 2018 and September 30, 2018, that relate to Endeavor's claim, further described on page 6 of the victim impact statement, that it transferred \$3,172,000 to WCMC at Ms. Hankins' request. This includes, but is not limited to, "the financial reporting from Ms. Hankins" regarding ticket sales and vendor obligations, as well as the "financial statements from Ms. Hankins," that Endeavor referenced in support of this claim.

7. Emails that Ms. Hankins sent to Endeavor between July 1, 2018 and September 30, 2018, requesting money to pay vendors and other festival-related expenses, to the extent that this request is not covered by the above.
8. The bank records that Endeavor references in support of its claim that Ms. Hankins paid herself \$385,000 between January 2017 and February 2018, as described on page 7 of the victim impact statement. This further includes materials supporting Endeavor's claim that these payments were not authorized.
9. Materials, including bank records and cash collection sheets, that Endeavor relied upon in connection with its claim that \$250,000 of cash collected during the 2018 festivals was missing, as well as materials to support its claim that the funds were misappropriated or otherwise used for an improper purpose. This allegation, and the referenced supporting materials, is further described on page 7 of the victim impact statement.
10. Materials related to Endeavor's claim regarding an unsupported \$600,000 journal entry, as further described on page 7 of the victim impact statement. This includes, but is not limited to, the general entry ledger, income statement and other financial documents, as well as bank statements and artist payments, which Endeavor referenced in connection with this claim.
11. WCMC's bank statements between March 1, 2018 and September 30, 2018, to the extent that these materials are not covered by the requests above.
12. Materials that support Endeavor's claim that \$2.64 million of the \$7 million in third-party loans that Ms. Hankins caused WCMC to incur could not be accounted for, as well as materials that support Endeavor's assumption that Ms. Hankins used the unaccounted-for funds for her own purposes, as further described on page 6 of the impact statement. This request further includes the promissory notes relating to the \$7 million in third-party loans.
13. The list of actual vendor obligations resulting from the 2018 festivals that Endeavor described on page 7 of the victim impact statement, as well as any materials that Endeavor or WCMC relied on in compiling that list. This request further includes the materials supporting Endeavor's claim that Ms. Hankins did not report those vendor obligations to Endeavor, an identification of the obligations that she did not report, as well as the materials showing that she had a duty to do so. This request also includes materials to support the claim that Ms. Hankins misrepresented a vendor payment obligation for \$460,000, including records related to the underlying obligation and any payments on it.
14. Communications that Endeavor received from vendors regarding payment in connection with the 2018 festivals.
15. The WCMC records that show that some of the vendors requesting payment from the 2018 festivals had already been paid, which is further described on page 7 of the victim impact statement.

16. Communications between Endeavor and the government regarding the factual allegations contained within the victim impact statement concerning misapplication of funds by Ms. Hankins or theft of funds by Ms. Hankins.
17. The government's investigative finding in support of the government's representations that Ms. Hankins did not misappropriate WCMC funds for her own personal benefit.